

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

SHERYL WULTZ, *et al.*

Plaintiffs-Respondents,

v.

BANK OF CHINA LTD.,

Defendant.

THE STATE OF ISRAEL,

Petitioner.

No. 11 Civ. 1266 (SAS)

**DECLARATION OF LEE S. WOLOSKY**

I, Lee S. Wolosky, hereby declare as follows: I am an attorney in the law firm of Boies, Schiller & Flexner LLP, counsel for Plaintiffs-Respondents in the above-referenced action. I make this declaration based on my personal knowledge.

1. Attached hereto as Exhibit 1 is a true and correct copy of a letter from Uzi Shaya to Lee S. Wolosky, Mitchell R. Berger, and Robert J. Tolchin, dated March 20, 2013.

2. Attached hereto as Exhibit 2 is a true and correct copy of a letter from Uzi Shaya to Nitsana Darshan-Leitner and Lee Wolosky, dated August 29, 2013.

3. Attached hereto as Exhibit 3 is a true and correct copy of a letter from Lee S. Wolosky to Uzi Shaya, dated April 18, 2014.

4. Attached hereto as Exhibit 4 is a true and correct copy of an excerpt of the transcript of the July 19, 2013 conference before the Honorable Shira A. Scheindlin in *Wultz v. Bank of China Ltd.*, No. 11 Civ. 1266 (SAS) (S.D.N.Y.).

5. Attached hereto as Exhibit 5 is a true and correct copy of an article by David Shamah titled "Israel, China to Open \$300 Million Research Center," as it appeared on the website of The Times of Israel as of June 16, 2014.

6. Attached hereto as Exhibit 6 is a true and correct copy of an article by Yaacov Benmeleh titled "Israel's Tech Industry is Becoming All About 'China, China, China,'" as it appeared on the website of Bloomberg as of June 16, 2014.

7. Attached hereto as Exhibit 7 is a true and correct copy of a letter from Lee S. Wolosky to John B. Bellinger, III, dated June 1, 2014.

8. Attached hereto as Exhibit 8 is a true and correct copy of a letter from Lee S. Wolosky to John B. Bellinger, III, dated June 16, 2014.

9. Attached hereto as Exhibit 9 is a true and correct copy of Bank of China Limited's Second Amended Notice of Fed. R. 30(b)(6) Deposition to Bank Hapoalim B.M. Pursuant to Subpoena Dated June 20, 2013, dated May 16, 2014.

10. Attached hereto as Exhibit 10 is a true and correct copy of Plaintiffs' subpoena to Bank Hapoalim B.M. dated May 30, 2014.

11. Attached hereto as Exhibit 11 is a true and correct copy of the Brief of Former Federal Judges as *Amici Curiae* in Opposition to the Petition for Writ of Certiorari of the Republic of Argentina in *Republic of Argentina v. NML Capital, Ltd.*, --- U.S. --- (2014) (No. 13-990).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 20, 2014  
New York, New York

  
\_\_\_\_\_  
Lee S. Wolosky